

FISHER & PHILLIPS LLP
 3200 N. Central Avenue, Suite 1550
 Phoenix, Arizona 85012-2487
 (602) 281-3400

1 Brian L. Bradford, NV Bar No. 9518
 FISHER & PHILLIPS LLP
 2 300 S. Fourth Street, Suite 1500
 Las Vegas, Nevada 89101
 3 Telephone: (702) 252-3131
 Fax: (702) 252-7411
 4 bbradford@fisherphillips.com

5 Pavneet Singh Uppal, AZ SBN 016805 (*Admitted Pro Hac Vice*)
 Kris Leonhardt, AZ SBN 026401 (*Admitted Pro Hac Vice*)
 6 FISHER & PHILLIPS LLP
 3200 N. Central Avenue, Suite 1550
 Phoenix, Arizona 85012-2487
 7 Telephone: (602) 281-3400
 Fax: (602) 281-3401
 8 puppal@fisherphillips.com
 kleonhardt@fisherphillips.com

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 10 Attorneys for Defendants

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 NAVAJO HEALTH FOUNDATION – SAGE
 14 MEMORIAL HOSPITAL, INC. (doing business
 as “Sage Memorial Hospital”); an Arizona non-
 profit corporation

15 Plaintiff,

16 v.

17 RAZAGHI DEVELOPMENT COMPANY,
 18 LLC; a Nevada limited liability company (doing
 business as “Razaghi Healthcare”), et al.,

19 Defendants.

20 Case No. 2:19-cv-00329-GMN-EJY

21 **JOINT STIPULATION TO
 EXTEND TIME FOR
 DEFENDANTS TO RESPOND TO
 PLAINTIFF'S FIRST AMENDED
 COMPLAINT [ECF No. 137]**

22 **(FIRST REQUEST)**

23 IT IS HEREBY STIPULATED AND AGREED that Defendants Razaghi
 24 Development Company, LLC, Ahmad Razaghi, and Tausif Hasan (collectively,
 “Defendants”) shall have a thirty-day extension of time, up to and including July 9, 2021 to
 respond to Plaintiff's First Amended Complaint (ECF No. 137). The parties have so

1 stipulated due to defense counsel's current case load, which includes a recent evidentiary
 2 hearing on an order to show cause for contempt and extensive pretrial obligations on a matter
 3 set for trial in early August. The additional time requested herein will permit counsel for
 4 Defendants to meet other pre-set case commitments and allow Defendants sufficient time to
 5 respond to the First Amended Complaint. This request is made in good faith and not for the
 6 purpose of delay. Neither party will be prejudiced by the requested extension. This is the
 7 first request to extend this deadline.

8 For the reasons set forth above, the parties ask the Court to approve this stipulation
 9 to extend the time for Defendants to respond to the First Amended Complaint from June 11,
 10 2021 up to and including July 9, 2021.

11 RESPECTFULLY SUBMITTED this 10th day of June 2021.

12 JENNER & BLOCK LLP

FISHER & PHILLIPS LLP

13 /s/ Douglass A. Mitchell (with permission)
 14 Douglass A Mitchell
 1099 New York Avenue, N.S., Suite 900
 Washington, DC 20001

15 Attorneys for Plaintiff

16 /s/ Kris Leonhardt
 17 Pavneet Singh Uppal
(Admitted Pro Hac Vice)
 Kris Leonhardt (*Admitted Pro Hac Vice*)
 3200 N. Central Avenue, Suite 1550
 Phoenix, Arizona 85012-2487

18 Attorneys for Defendants

19 IT IS SO ORDERED:

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 23 UNITED STATES MAGISTRATE JUDGE
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Dated: June 10, 2021